PARKER HANSKI LLC

40 WORTH STREET, SUITE 602 NEW YORK, NEW YORK 10013 PHONE: 212.248.7400 FAX: 212.248.5600

Contact@ParkerHanski.com

Application **GRANTED** in part. The current discovery deadlines are stayed for thirty days. By **July 15, 2022**, the parties shall file a joint status letter. If no settlement is reached by that time, by **July 15, 2022**, the parties shall file a proposed case management plan with firm dates

Via ECF

The Honorable Lorna G. Schofield for any remaining depositions. (See Dkt. No. 75.)

United States District Judge

Southern District of New York 500 Pearl Street

New York, NY 10007

Dated: June 15, 2022

New York, New York

LORNA G. SCHOFIELD
UNITED STATES DISTRICT JUDGE

Re: Iris Jimenez v. Bogoto Realty Inc., et al., No. 21-cv-9664 (LGS)

Dear Judge Schofield:

We represent the plaintiff in the above-entitled action. We write jointly with defendants Bogoto Realty Inc. and Farview Inc. ("Defendants, and together with plaintiff, the "Parties") to respectfully request that Your Honor stay this discovery in this action for 60 days (until August 13, 2022). The Parties make this request as they are currently engaged in settlement discussions and seek to conserve resources and focus their efforts on settlement.

The current discovery deadlines are July 29, 2022 for fact discovery, and September 15, 2022 for Expert Discovery. Party depositions and the inspection of Defendants' premises by plaintiff's expert are scheduled to occur this week and the week after.

The Parties also ask that the Court allow them to submit a joint status letter to apprise the Court as to their settlement efforts thirty days from today (July 14, 2022).

Thank you for your time and attention to this matter.

Respectfully,

/s/

Adam S. Hanski, Esq.